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March 13, 2023

**Via ECF**

The Honorable Judge Edgardo Ramos  
Thurgood Marshall U.S. Courthouse  
40 Foley Square, Courtroom 619  
New York, NY 10007

RE: *Securities and Exchange Commission v. Genesis Global Capital, LLC, and Gemini Trust Company, LLC*, Case No. 1:23-cv-287

Dear Judge Ramos:

In accordance with Your Honor's Individual Practices in Civil Cases Rule 1(E) and Joint Local Civil Rule 7.1(d), Defendant Gemini Trust Company, LLC ("Gemini") respectfully writes without opposition from the plaintiff to request a 45-day extension of the deadline for the time to answer or otherwise respond to the Complaint in the above-referenced case, until May 4, 2023. The parties are in preliminary discussions about a potential agreed resolution to the case, and the additional time will allow those discussions to continue and conserve Court resources and time.

The Complaint in this action was filed on January 12, 2023. Dkt. 1. On January 18, 2023, Gemini agreed to waive formal service of the Complaint. Dkt. 9. Currently, Gemini's deadline to answer is March 20, 2023. No other requests for adjournment or extension of time have been previously requested.

Gemini's counsel has conferred with counsel for the Securities and Exchange Commission, who consents to the requested extension.

Respectfully submitted,

JFB Legal, PLLC

By: /s/ John F. Baughman

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Attorneys for *Gemini Trust Company, LLC*

cc: all parties via ECF